From: Kelly Cook

To: Toby Baker; Stephanie Bergeron Perdue; Steven Schar; Ferrell Fields; Ryan Vise; Ramiro Garcia; Tracy Miller;

Susan Johnson; Jonathan Walling; Nicole Bealle; Jeff Kunze; anthony.buck@tceq.texas.gov; Michelle Havelka;

Richard Chism; Michael Honeycutt

Cc: <u>Crossland, Ronnie</u>; <u>Adams, Adam</u>

Subject: 3-25-19 Observations

Date: Monday, March 25, 2019 6:19:13 PM

Attachments: <u>image001.png</u>

All.

Here are the ITC operation observations we requested from SWS and Williams.

From: Stamper, Tony <tstamper@nrcc.com>
Sent: Monday, March 25, 2019 5:31 PM
To: Kelly Cook <kelly.cook@tceq.texas.gov>

Subject: 3-25-19 Observations

Fire Positive:

- Acquisition of Williams equipment to supply foam to fire monitor on NW corner of tank farm.
- Contractor working to de-inventory tanks
- Evacuation of secondary containment being maintained.
- Fire monitors appear to be staffed and ready.

Fire Negative:

- No notification system in place prior to foaming tank farm. Need to make sure all personnel are out of the secondary containment before commencing with foaming ops.
- No fire suppression ring around the tank farm.
- Apply foam only as needed.
- Using old and/or poor quality foam.
- Staged vehicle / equipment congestion on Independence Pkwy just South of tank farm. If an emergency occured, a southern routed evacuation would prove to be difficult. A clear path of ingress and egress should be maintained at all times. Restricting entry is fine and expected, don't clog up with parked vehicles and trailers.

Environmental Positive:

- Second underflow dam in ditch near gate 13 from Tidal Rd.
- Vac trucks positioned upstream of underflow dam.
- Marine ops oversite by USCG

Environmental Negative:

- No one addressing impact of contaminated soil adjacent to Tidal Rd ditch or entrance of Tucker Bayou.
- Containment at Tidal Rd / Tucker Bayou bridge needs attention. Better boom deployment or another underflow dam should be constructed and a vac truck in place to catch as much product as possible before it migrates off site.

If you have any questions please let me know.

Thanks

Tony StamperBranch Manager



1700 North E Street La Porte, TX 77571 United States

24 Hour Emergency Service: 1 (800) 899-4672